

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) TERRA WALKER, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. CIV-14-914-L
)	
(1) APEX WIND CONSTRUCTION,)	
LLC, et al.,)	
)	
Defendants.)	

**KINGFISHER WIND LAND HOLDINGS, LLC'S JOINDER
TO CERTAIN DEFENDANTS' PARTIAL MOTION TO DISMISS**

Defendant Kingfisher Wind Land Holdings, LLC ("KWLH") hereby files this Joinder to the Partial Motion to Dismiss (Doc. 46) (the "Partial Motion to Dismiss") filed by Defendants Apex Wind Construction, LLC, Apex Clean Energy, Inc., Apex Clean Energy Holdings, LLC, Kingfisher Wind, LLC, Kingfisher Transmission, LLC, Campbell Creek Wind, LLC, and Campbell Creek Wind, Transmission, LLC. The Partial Motion to Dismiss is incorporated by reference herein.

WHEREFORE, for the reasons set forth in the Partial Motion to Dismiss, KWLH respectfully requests that this Court enter an order dismissing the Plaintiffs' anticipatory trespass claim and dismissing any class action or other representative claims asserted by the individual Plaintiffs, and for such other and further relief deemed just and equitable by the Court.

Respectfully submitted,

PHILLIPS MURRAH P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of March, 2015, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

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